

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: BISON LAND & MINERALS LLC
DEBTOR**

**CASE NO. 23-01140-JAW
CHAPTER 11**

**IN RE: ENTEC SERVICES, LLC
DEBTOR**

**CASE NO. 23-01141-JAW
CHAPTER 11**

**IN RE: GEARY TRIGLETH
DEBTOR**

**CASE NO. 23-01504-JAW
CHAPTER 11**

**RESPONSE TO
MOTION TO CONTINUE/RESCHEDULE
HEARINGS AND FOR RELATED RELIEF**

Sparrow Oil & Gas LLC, Greg Pollard, and Kiat Tze Goh (the “Sparrow Creditors”) respond to the Debtor’s Motion to Continue/Reschedule Hearings and for Related Relief (the “Motion”), as follows:

1. The Sparrow Creditors agree to continuing the hearing on the Sparrow Creditors’ motion to dismiss and confirmation of the Debtor’s subchapter V plan until after discovery is complete and at a time when counsel for all parties are available.

2. The Sparrow Creditors do object to combining the hearings for the following reasons:

- a. As set forth in the Sparrow Creditors’ motion to dismiss, Debtor Geary Trigleth lost the ability to manage and control Debtor Bison Land & Minerals LLC when he filed an individual bankruptcy petition. To the extent the Sparrow Creditors prevail on that argument, Bison cannot proceed to a confirmation hearing on a plan drafted and proposed under Trigleth’s

direction. That issue, then, should be decided before the parties and the Court spend time and resources preparing for confirmation.

- b. To the extent the Sparrow Creditors otherwise prevail on their motion to dismiss, the confirmation hearings would be moot, negating the need for the parties and the Court to spend time and resources preparing for confirmation issues outside the motion to dismiss.

For these reasons, the Sparrow Creditors agree that the hearings on the motion to dismiss and confirmation of the Debtor's subchapter V plan should be continued, but the Sparrow Creditors request that the Court set the hearing on the motion to dismiss before any confirmation hearing.

Dated: August 23, 2023.

**SPARROW OIL & GAS LLC,
GREG POLLARD, AND
KIAT TZE GOH**

By: /s/ Timothy J. Anzenberger
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CERTIFICATE OF SERVICE

Service provided via Notice of Electronic Filing through the Court's Electronic Filing System upon all parties signed up to receive such notices.

Dated: August 23, 2023.

/s/ Timothy J. Anzenberger
Timothy J. Anzenberger